

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

Poplar Bluff Regional Office

948 Lester St.

P.O. Box 1420

Poplar Bluff, MO 63901

314-785-0832

May 2, 1990

Mr. Urban Klein  
Vice President, Sales Manager  
Silvanus Products, Incorporated  
40 Merchant Street  
Ste. Genevieve, Missouri 63670

L.O.W. 90-SE 003

CERTIFIED MAIL: P 179 368 276

Dear Mr. Klein:

Enclosed is a Report on Inspection of the Silvanus Products, Incorporated facility conducted on December 20, 1989. This inspection was made to determine if Silvanus Products, Incorporated was in compliance with the environmental laws of the State of Missouri and rules of the Department of Natural Resources and applicable rules of the U.S. Environmental Protection Agency pertaining to hazardous waste management. The contents of the report are believed to be self-explanatory. If, however, you have any questions concerning any part of the report, please call Albert R. Wampler at our Poplar Bluff Regional Office, 314-785-0832.

The Department of Natural Resources strongly urges that the recommendations contained in this report be given your immediate attention. The recommendations are, in our best judgement, necessary actions to return your facility to compliance. Your facility should submit copies of documentation requested in these recommendations to the Department of Natural Resources, Waste Management Program, Attn: Arthur Groner, Section Chief, Hazardous Waste Enforcement, P.O. Box 176, Jefferson City, MO 65102 and to the Department of Natural Resources, Southeast Regional Office, Regional Administrator, P.O. Box 1420, Poplar Bluff, MO 63901.

Compliance should be completed within thirty (30) days of receipt of this report and documentation of compliance should be mailed to each above mentioned offices within thirty (30) days of receipt of this report. Staff of the Department of Natural Resources will be



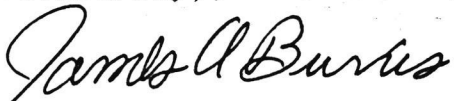
R00016229

RCRA Records Center

Mr. Urban Klein  
May 2, 1990  
Page 2

performing future investigations to determine if corrective actions have been successful in achieving compliance.

Sincerely,



James A. Burris, P.E.  
Regional Administrator

JAB/<sup>ARW</sup>ARW/sw

Enclosures

cc: Arthur Groner, Waste Management Program ✓

RESOURCE CONSERVATION AND RECOVERY ACT  
AND  
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW  
COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY

Silvanus Products Incorporated  
40 Merchant Street  
Ste. Genevieve, MO 63670  
(314) 883-3521

EPA ID: None  
MO Generator: None  
Former Georgia-Pacific ID  
MOD092351642 has been assigned

PARTICIPANTS

Department of Natural Resources

Mr. Albert R. Wampler  
Environmental Engineer II  
Southeast Regional Office

Silvanus Products Incorporated

Mr. Urban Klein  
Vice President, Sales Mgr.

INTRODUCTION

On December 20, 1989, Albert R. Wampler, representing the Missouri Department of Natural Resources, Southeast Regional Office, conducted an inspection of the Silvanus Products, Incorporated facility located in Ste. Genevieve, Missouri. The inspection was conducted to determine compliance of the facility with the Resource Conservation and Recovery Act, the Missouri Hazardous Waste Management Law, and applicable state and federal regulations promulgated thereunder. Authority to conduct such inspections has been granted under sections 260.375(9) and 260.377, RSMo.

FACILITY DESCRIPTION

Silvanus Products, Incorporated has been classified by the Department of Natural Resources as being a treatment, storage and disposal facility. The facility is located in downtown Ste. Genevieve. The facility has been at their present location since the formation of the Silvanus Products, Incorporated facility in May of 1984. Before this date, the building housed the Georgia-Pacific Corporation facility processes. During May 1984 a group of employees and investors purchased the subject facility Georgia-Pacific, Ste. Genevieve, changing the name to Silvanus Products, Incorporated.

Silvanus Products, Incorporated manufactures loose leaf vinyl products, decorative and plain such as notebook binders, menu covers,



and checkbook covers. Also, some paper products and bank books for recording loan payments, are manufactured.

The facility generates one (1) waste stream that being ink cleaning rags and a few solvent cleaning rags, which are generated in a quantity less than 220 pounds per month. The rags are generated at the silk screening and off-set printing operations where they are used for cleaning the equipment. Since these rags are not generated in the amount of a quantity of hazardous waste requiring registration, they are transported to the sanitary landfill for disposal. The facility incorporates a very small amount of ignitable solvent and ink, used for printing on the vinyl covers as raw materials. Due to the fact Silvanus generates only the above mentioned waste, the appropriate classification would be a conditionally exempt small quantity generator.

#### UNSATISFACTORY FEATURES

The following unsatisfactory features list the regulatory or statutory provisions which Silvanus Products, Incorporated was in violation of at the time of the inspection. All 40 CFR regulations cited have been adopted by reference in the Missouri Hazardous Waste regulations.

Silvanus Products, Incorporated has not submitted documentation to the Department of Natural Resources showing that the facility status changed from the treatment, storage and disposal classification held by the former facility Georgia-Pacific. (Although the inspection results revealed that Silvanus Products, Incorporated is now operating as a conditionally exempt small quantity generator, from a departmental view point, the facility is in violation of all major facility requirements concerning interim status, TSD regulations). A waste analysis plan, closure plan, personnel training program, contingency plan etc., as stated in 40 CFR 265, is required. No facility closure plan has been approved and implemented. No Part B application has been filed to obtain a TSD facility permit.

#### COMMENTS

Mr. Urban Klein, Vice President, Sales Manager, acted as the facility representative during the inspection. Appropriate credentials were presented by the inspector and an explanation given as to the purpose of and the authority to conduct the inspection. Mr. Klein was informed of the facility's rights to confidentiality. An explanation was given during the initial conference as to how the inspection



would be conducted. Mr. Klein was informed that possible photographs and copies of documentation would be required.

A request was made for a visual inspection of the facility to determine which waste streams were generated, and at what point in the manufacturing process the wastes were generated. It was observed that vinyl was received at the facility in large quantities and colors. The vinyl was cut to size, depending upon the product to be manufactured. Once cut to size and formed, the vinyl was printed with appropriate letters or business names and stocked for shipment. Printing and silk screening process equipment require cleaning periodically, and these were noted as being the only waste generation points. A few rags were observed in containers near these points. There was no liquid waste observed anywhere in the building. Some scrap vinyl and paper products were generated, also being transported to the landfill for disposal. The facility did not have any hazardous waste storage area designated, due to nature of wastes generated.

After the facility visual inspection, Mr. Klein and the inspector returned to his office. Since no hazardous waste had been manifested off-site since June 21, 1984, the facility had no records to be examined. Mr. Klein was informed by the inspector that the facility was operating as an exempt small quantity generator at the present time. Mr. Klein was also informed that should the facility begin generation of wastes or accumulation of wastes greater than 220 lbs in any month, generator registration would become required along with compliance with 40 CFR Part 262. Mr. Klein was informed that departmental records indicated that Silvanus Products, Incorporated was classified as a treatment, storage, and disposal facility, and that it would be their facility's responsibility to resolve this matter, so as to assure proper classification. To resolve this issue, documentation of implementation of closure must be submitted and department approval of the closure obtained. Department records of Georgia-Pacific's TSD notification indicate several 55 gallon containers were stored at the site and the plant layout diagram and supporting documentation indicated an on-site incinerator. Both the drum storage and the incinerator must be resolved to return to compliance.

#### RECOMMENDATIONS

The recommendations listed below are for your facility's use as guidelines for implementation of corrective actions. It will be the responsibility of Silvanus Products, Incorporated to implement specific corrective actions and satisfactorily document them to

demonstrate a return to compliance with the hazardous waste laws and regulations.

We recommend Silvanus Products, Incorporated secure proper documentation and submit to the Department of Natural Resources, copies of such documentation, which will support that Silvanus Products, Incorporated is not and should not be classified as a treatment, storage, and disposal facility. Copies of documentation should be sent to both the Department of Natural Resources, Waste Management Program, Attn: Arthur Groner, Hazardous Waste Enforcement, P.O. Box 176, Jefferson City, MO 65102 and Department of Natural Resources, Regional Administrator, Southeast Regional Office, P.O. Box 1420, Poplar Bluff, MO 63901. Documentation of the TSD facility closure for the container storage and the incinerator interim status facilities should be submitted for Department review and approval to Mr. Dan Tschirgi, P.O. Box 176, Jefferson City, MO 65102.

#### ADDITIONAL COMMENTS

From a complete review of inspections of the Silvanus Products, Incorporated facility, since their purchase of the Ste. Genevieve Georgia-Pacific Company operations, in May of 1984, it is apparent that Silvanus is not a treatment, storage, or disposal facility. Georgia-Pacific did retain "generator" and "interim status TSD" ID numbers. Georgia-Pacific had registered their ink contaminated and solvent contaminated rags as a hazardous waste in April of 1983. At the time of the purchase and formation of Silvanus, in May 1984, Georgia-Pacific had remaining on the site sixteen (16) drums of ink and oil soaked rags. These drums were transported off the site by Kies Transport of Kansas City, KS (KS D980853246) to Chemical Waste Management, Incorporated, Emelle, Alabama facility (AL D000622464) on June 21, 1984. Georgia-Pacific was listed as the generator on the manifest. This was during the transition.

A letter dated May 25, 1984, to Director, David E. Bedan, Waste Management Program, from Mr. Saul J. Furstein, Senior Environmental Engineer for Georgia-Pacific, advised the Department of Natural Resources of the purchase of the subject facility, Georgia-Pacific, by Silvanus Products, Incorporated. In that letter, Mr. Furstein requested that the generator number and interim status be transferred to the Silvanus facility. Mr. Phil McKersie was said to be the new facility contact person. On May 29, 1984 Mr. Phil McKersie, President, of the newly formed facility contacted Mr. David E. Bedan, Director, Waste Management Program, and informed his office that Silvanus would not be generating or storing hazardous waste as

outlined by RCRA regulations, and it would not be necessary to transfer the ID numbers. Also, it was stated that should the ID numbers already be transferred, that they be deleted. A copy of the original notification of hazardous waste registration was found in this office's files for Georgia-Pacific stamped "DELETED", ID number MOD092351642. There is no record on file showing that Silvanus Products, Incorporated registered as a hazardous waste generator. This would be substantiated by the information contained in Mr. Phil McKersie's letter dated May 29, 1984. Also, it was found that Georgia-Pacific submitted a closure plan in September of 1982, for the Ste. Genevieve facility. In a letter to Mr. Phillip McKersie, of the Georgia-Pacific Corporation, dated March 30, 1984 from Wolfgang A. Scheucher, Waste Management Program, a request was made for additional information concerning the "Closure Plan Cost Review". An amended closure plan was requested on that date, to be submitted by Georgia-Pacific, within sixty days. No further correspondence was noted concerning this matter.

From information gathered from the Southeast Regional Office files, it is evident that the Silvanus Product, Incorporated facility was formed as a separate entity from Georgia-Pacific. Silvanus Products, Incorporated did not register and did not expect to generate greater than 220 pounds of hazardous wastes. The results of previous RCRA inspections of Silvanus and this most recent inspection, clearly demonstrates that Silvanus Products, Incorporated is not a TSD facility, and falls into the category of a conditionally exempt small quantity generator.

It was observed from departmental files that Georgia-Pacific submitted a closure plan. Evidence of follow through of Georgia-Pacific can not be verified. Deletion of the generator EPA ID number MOD09235642 for Georgia-Pacific was stamped and located in the files. The reason for Silvanus retaining the ID for Georgia-Pacific has not been explained from data found in the files. It is possible the Department of Natural Resources did not receive proper closure for the Georgia-Pacific Company and are therefore regarding the Silvanus Products facility to be the identical facility with only a name change.

SUBMITTED BY:

*Albert R. Wampler*  
Albert R. Wampler  
Environmental Engineer II

ARW/RLR/sw

APPROVED BY:

*Rick L. Roberts*  
Rick L. Roberts, P.E.  
Environmental Engineer III



(10-15-88)

Date: DECEMBER 20, 1989

Other Inspections Done:

RR \_\_\_\_\_ TRANS \_\_\_\_\_ LDR \_\_\_\_\_

\_\_\_\_\_

EPA ID# NONE-FORMER MD0092351642  
GEORGIA-PACIFIC COMPANY NO.

Title: VICE PRESIDENT, SALES MGR

Restricted access sign posted at each entrance . . . . .

Briefly describe waste streams managed at each TSD process.

<u>Waste</u>	<u>Amount/month</u>	<u>Process</u>	<u>Design Capacity</u>
	<i>NONE</i>		

E. GENERAL INSPECTION 10 CSR 25-7.265(2) AND 7.265(2)(B)

Facility inspected and maintained. . . . . ( )  
Inspection log and written schedule for inspecting . . . . . ( )  
Inspect emergency equipment. . . . . ( )  
Inspect security devices . . . . . ( )  
Inspect operating and structural equipment . . . . . ( )

F. PERSONNEL TRAINING 10 CSR 25-7.265(2) AND 7.265(2)(B)

Documentation of hazardous waste director's qualifications or training ( )  
Completed classroom or on-the-job training . . . . . ( )  
Job title, description, and name of person filling position. . . . . ( )  
Written record of the type and amount of training given. . . . . ( )  
Documentation confirming that training has been given. . . . . ( )

G. PREPAREDNESS AND PREVENTION 10 CSR 25-7.265(2) AND 7.265(2)(C)

Internal communication or alarm system . . . . . ( )  
Device in the hazardous waste operation area capable of summoning emergency assistance . . . . . ( )  
Fire control, spill control, and decontamination equipment available . . . . . ( )  
Adequate water supply for fire control equipment . . . . . ( )  
Adequate and proper safety equipment available . . . . . ( )  
Adequate aisle space . . . . . ( )  
Arrangements with local emergency agencies . . . . . ( )

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.265(2) AND 7.265(2)(D)

Contingency plan . . . . . ( )  
Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste . . . . . ( )  
Describe formal arrangements with emergency agencies . . . . . ( )  
Names, addresses and phone numbers (home & office) of emergency coordinators . . . . . ( )  
Emergency equipment including its description and location . . . . . ( )  
Evacuation plan if applicable. . . . . ( )

I. WASTE OIL 10 CSR 25-11.010

Waste oil properly handled . . . . . ( )  
Written waste oil contract maintained. . . . . ( )

J. MANIFEST, RECORDS, REPORTING 10 CSR 25-7.265(2) AND 7.265(2)(E)  
For off-site facilities

Manifests signed and dated . . . . . ( )  
Copy to transporter. . . . . ( )  
Copy to generator in 30 days . . . . . ( )  
Copy at facility for 3 years . . . . . ( )

Operating record

Description, quantity, and TSD process for all hazardous wastes. . . . . ( )  
Location and quantity of all hazardous waste . . . . . ( )  
Waste analysis records from off-site sources . . . . . ( )  
Summary and description of emergency incidents . . . . . ( )  
Record of inspections. . . . . ( )  
Monitoring, testing and analytical results if necessary. . . . . ( )

Reporting

Unmanifested waste reports for off-site facilities . . . . . ( )  
Reports for emergencies, spills, closure . . . . . ( )

K. INTERIM STATUS CONTAINERS 10 CSR 25-7.265(2) AND 7.265(2)(I)

Containers closed and in good condition. . . . . ( )  
Containers made of materials compatible with hazardous wastes placed in them . . . . . ( )  
Hazardous waste containers storage area inspected once a week. . . . . ( )  
Inspection log . . . . . ( )  
Containers holding ignitable or reactive waste at least 50 ft. from the property line. . . . . ( )  
Incompatible waste placed in different containers. . . . . ( )  
Are storage containers holding hazardous waste which are incompatible with nearby materials separated by dikes, berms, walls, or other devices. . . . . ( )  
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-7.265(2)(I). . . . . ( )

L. INTERIM STATUS TANKS - 10 CSR 25-7.265(2) AND 7.265(2)(J)  
(See Tank Checklist)

M. INTERIM STATUS SURFACE IMPOUNDMENTS 10 CSR 25-7.265(2) AND 7.265(2)(K)

2 ft. of freeboard in surface impoundment. . . . . ( )  
Earthen dikes have protective covers . . . . . ( )  
New additions, replacements, or expansions of existing surface impoundments designated with double liner and leachate system . . . . . ( )  
Waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment . . . . . ( )  
Freeboard level inspected each operating day . . . . . ( )  
Dikes & vegetation inspected weekly for leaks, deterioration or failures ( )  
Inspections recorded in inspection logs. . . . . ( )  
Waste treated, rendered or mixed so that mixture no longer meets the definition of ignitable or reactive. . . . . ( )  
Incompatible wastes segregated in separate surface impoundments. . . . . ( )

- N. GROUNDWATER MONITORING 10 CSR 25-7.265(2) AND 7.265(2)(F)  
Applicable to surface impoundments, landfills and landfarms
- Groundwater monitoring wells installed . . . . . ( )
- Wells are structurally sound . . . . . ( )
- Sampling and analysis plan on-site . . . . . ( )
- Samples and groundwater levels taken . . . . . ( )
- Groundwater monitoring results kept. . . . . ( )
- O. CLOSURE AND POST-CLOSURE 10 CSR 25-7.265(2) AND 7.265(2)(G)
- Closure plan for facility. . . . . ( )
- Description of how and when facility will be closed. . . . . ( )
- Estimate of maximum inventory of hazardous waste . . . . . ( )
- Steps to decontaminate equipment . . . . . ( )
- Post-closure plan for disposal facilities only . . . . . ( )
- P. FINANCIAL REQUIREMENTS 10 CSR 25-7.265(2) AND 7.265(2)(H)
- Cost estimate for facility closure . . . . . ( )
- Financial assurance for closure and post-closure . . . . . ( )
- Liability for sudden accidents . . . . . ( )
- Liability for non-sudden accidents for disposal only . . . . . ( )

COMMENTS: FACILITY DID NOT CLASSIFY AS A TSD.

SMALL QUANTITY CONDITIONALLY EXEMPT

RECOMMEND RE-CLASSIFICATION - FACILITY NEEDS TO

SUBMIT DOCUMENTATION FOR PROOF OF NON-TSD

Inspector Signature & Title: Albert R. Wampala ENVIRONMENTAL ENGINEER

Office: SOUTHEAST REGIONAL OFFICE, POPLAR BLUFF, MO

IN COMPLIANCE (✓)

IN VIOLATION OR ( )  
ABSENT





May 25, 1984

Mr. David E. Vedan, Ph.D.  
Director, Waste Management Program  
Missouri Department of Natural Resources  
Division of Environmental Quality  
P. O. Box 1368  
1915 S. Ridge Drive  
Jefferson City, Missouri 65102

Dear Mr. Vedan:

Subject: Ste. Genevieve, Missouri Plant  
EPA I. D. MOD092351642

Please be advised that the subject facility has been purchased from Georgia-Pacific by Silvanus Products, Inc. Please transfer the generator number and interim status to the new owner. Mr. Phil McKersie at the Ste. Genevieve Plant will be the plant contact.

Thank you in advance for your attention to this matter.

Sincerely,

*Saul Furstein*

Saul J. Furstein  
Senior Environmental Engineer

SJF/bfc

cc: Mr. Robert L. Morby, Chief  
Waste Management Branch  
U. S. Environmental Protection Agency  
Region VII  
324 E. 11th Street  
Kansas City, Missouri 64106

~~Phil McKersie - Ste. Genevieve~~

bcc: Messrs. G. Fred McCaig  
J. D. Petersen  
R. A. Horder

# **S**ilvanus Products, Inc.

Ste. Genevieve, Missouri 63670  
Telephone (314) 383-3521



January 29, 1985

Mr. Bruce Martin,  
Missouri Dept. of Natural Resources  
948 Lester St.  
Poplar Bluff, MO 63901

Good Morning Bruce!

As a result of your inspection this morning I'm sending this memo in reference to a letter from Georgia-Pacific Corp., Mr. Saul Furstein, (attached), dated 5/25/84, this operation was in fact purchased by Silvanus Products, Inc. While Georgia-Pacific did have "Generator" and "Interim Status TSD" I.D. numbers, they have removed the 12-15 drums of hazardous waste which they were storing on the premises.

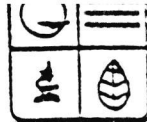
Silvanus' will not be generating or storing hazardous waste as defined by RCRA Regulations, so it will not be necessary to transfer the I.D. numbers as requested by Mr. Furstein. If the numbers have already been transferred, then it is requested they be deleted from your records.

If there are further questions please let me know. Thank you in advance for your assistance in this matter.

Cordially,

Philip S. McKersie, President  
Silvanus Products, Inc.

PM:jm



APR 10 1983

Part I - GENERAL INFORMATION

(Instructions: Print in Black Ink or Typewrite)

Section A WASTE Silva

**DELETED**

Business Name GEORGIA-PACIFIC CORP.

Mailing Address 40 MERCHANT ST.

City STE. GENEVIEVE State MO Zip Code 63670

Name of site where the hazardous waste is generated GEORGIA-PACIFIC (NONE GENERATED)

Site Address 40 MERCHANT ST. STE. GENEVIEVE STE. GENEVIEVE MO 63670  
Street City County State Zip Code

Number of employees at site: \_\_\_\_\_ OFFICE USE ONLY 1 9 3

Name of Employee who is familiar with hazardous waste management practice at the site:  
PHILIP MCKERSIE Telephone Number 883-3521

Parent Firm \_\_\_\_\_

Address \_\_\_\_\_  
Street City County State Zip Code

Section B

List principal Standard Industrial Classification numbers: 2782

Describe principal activity: VINYL LOOSELEAF PRODUCT MANUFACTURER

EPA Generator identification number if applicable (12 spaces) MOD092351642

Dun & Bradstreet number if one is assigned (9 digits) \_\_\_\_\_

Section C

Does your firm generate more than 220 lbs. per month of a hazardous waste included in 10 CSR 25-4.010? ☐ YES ☒ NO

Does your firm generate a hazardous waste which is listed in 10 CSR 25-4.010(6)(I) or (6)(L)? ☐ YES ☒ NO

Section D

I hereby certify that the information provided herein is complete and correct to the best of my knowledge. I understand that all information in this registration may be made available to the public, unless otherwise noted, according to section 10 CSR 25-5.010(9) as provided by section 260.430 of the Hazardous Waste Management Law. I am authorized to sign official documents for the above organization.

4-1-83  
Date

PHILIP S. MCKERSIE RESIDENT MGR.  
Print Name Title

Philip S. McKersie  
Signature





Georgia-Pacific Corporation

1985  
Peachtree Street, N.E. (30303)  
P.O. Box 105605  
Atlanta, Georgia 30348-5605  
Telephone (404) 521-4000

February 26, 1985

Mr. Philip McKersie  
Silvanus Products, Inc.  
40 Merchant Street  
St. Genevieve, MO 63670

Dear Phil:

Re: Hazardous Waste Manifest

I am returning to you the original Hazardous Waste Manifest for disposal of the 16 drums of solvent soaked rags that were sent to Emelle, AL. in 1984. This manifest must be kept in your files in St. Genevieve and be available for inspection by the Environmental Protection Agency or by the State Hazardous Waste Branch. I have retained a copy for our files in Atlanta, and am sending a copy to Bruce Martin of the Missouri Department of Natural Resources.

The original copy of the manifest was obtained from the St. Louis plant which is now Quality Business Accessories. If you have any questions about the manifest, please contact me at 404/521-4655.

Sincerely,

G. Fred McCaig, Manager  
Environmental Engineering

GFM/bfc

cc: R. A. Horder, with attachments  
Bruce Martin, with attachments



3048

# ALABAMA HAZARDOUS WASTE MANIFEST No 130444

CWMA

## IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR GEORGIA-PACIFIC CORP.	STE. GENEVIEVE, MO 40 MERCHANT STREET 63613	314-883 3521	MO D 09 2 35 1 64 2
TRANSPORTER NO. 1 KIES TRANSPORT	601 KINDELBERGER KANSAS CITY, KS 66115	816 913 342-2031	KS D9 8 0 85 32 4 6
TRANSPORTER NO. 2			
TRANSPORTER NO. 3			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459	205-652-9721	AL D 0 0 0 6 2 2 4 6 4

## WASTE INFORMATION

CONTAINER NO.	TYPE	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
16	DRUMS	(FLAMABLE) NA 1993-UN 1856 INK AND OIL SOAKED RAGS	16		FO01 FO05 U002	RMD-D27999	1600 #

6-22-84

## EMERGENCY INFORMATION

EMERGENCY NOS.: — (205) 652-9721; GENERATOR — ( ) US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

## CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, and the U.S. Environmental Protection Agency:

Philip A. McKeel FOR GEORGIA-PACIFIC PRESIDENT  
Generator Title  
SILVANUS CORP.

6/20/84  
Date

This is to certify acceptance of the hazardous waste shipment described above:

Charles E. Collins Driver  
Transporter #1 Title

6/21/84  
Date

Transporter #2

Title

Date

Transporter #3

Title

Date

This is to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Jimmy McDaniel Env Sci Tech  
Disposer Title

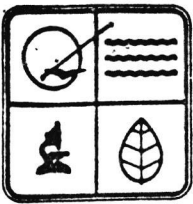
6-25-84  
Date

## DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	16	SS	S-081	18			H100%

RECEIVED JUL 2 1984

GENERATOR NO. 2



March 30, 1984

3.500 St. Genevieve Co.  
T-1 84 Georgia Pacific Corp.  
H.W.

Mr. Phillip McKersie  
Georgia Pacific Corporation  
40 Merchant Street  
P. O. Box 427  
Ste. Genevieve, MO 63670

EPA I.D. NO: MOD092341642

Missouri I.D. NO: 01659

Dear Mr. McKersie:

Enclosed please find a copy of the "Closure Plan Cost Review" regarding the Georgia-Pacific Corporation Closure Plan dated September 1, 1982. These review comments which were developed by a U.S. EPA contractor should be self-explanatory.

The Missouri Department of Natural Resources has been authorized to transmit these review comments and take follow-up action on any compliance response by your facility.

Georgia Pacific Corporation must address the deficiencies noted in the "Closure Plan Cost Review" and provide the Missouri Department of Natural Resources with an amended closure plan. Sixty (60) days from the date of this letter please provide us with the details called for by the narrative in items 1 thru 7.

Send all documentation concerning closure plans to Wolfgang A. Scheucher of this office.

If you have any questions or if we can be of further assistance to you, please contact Mr. Scheucher.

Sincerely,

Wolfgang A. Scheucher  
Environmental Specialist  
Waste Management Program

WS/bki

Enclosure

cc: U.S. EPA Region VII  
Poplar Bluff Regional Office ✓  
Arthur Groner

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Jefferson City, Missouri 65102 (314) 751-3241  
1915 Southridge Drive  
P.O. Box 1368

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director



## Closure Plan Cost Review

Facility: Georgia Pacific Corp.  
Ste. Genevieve, Missouri

EPA I.D. No.: MOD092351642

The closure plan, including cost estimates, for this facility is exactly the same as for the Georgia Pacific facility at St. Louis (MOD046376398). The storage configuration represented in the Part A applications for these facilities are the same, and the facilities generate the same waste types in approximately the same annual volumes. Therefore, the comments for the St. Louis facility also apply to this facility.

## Closure Plan Cost Review

Facility: Georgia Pacific Corp.  
St. Louis, Missouri

EPA I.D. No.: MOD046376398

1. The closure plan does not include details required by 40 CFR 265, Subpart G. Specific elements that are required by 40 CFR 265 and are not addressed or are inadequately addressed are:
  - ° Expected year of closure and schedule for final closure are not included (40 CFR 265.112(a)(4)).
  - ° Description of how containment area will be inspected and waste residues removed is not included (40 CFR 265.178).
  - ° Procedures for decontaminating facility equipment, criteria for demonstrating decontamination has been effective and a list of equipment to be decontaminated during closure are not included (40 CFR 265.112(a)(3)).
2. The cost estimate includes no fee for certification. It indicates that certification will be done by in-house personnel. 40 CFR 265.115 requires certification by both the owner or operator and an independent professional engineer.
3. Sampling and analysis and removal of piping are designated as being accomplished in-house and have no costs designated. In spite of the intention to use in-house facilities and personnel, a cost will still be incurred. The cost estimate for these line items should be shown. The basis for the estimate, e.g., number and types of samples and labor requirement for equipment removal and cleaning, should be itemized..
4. The cost of drum removal and disposal (\$40.00/drum) is within an expected cost range for landfill disposal of drums with no free liquid, incineration of liquids in metal drums, and solvent recovery. The method of disposal and physical state of wastes (liquid or solid) is not specified, however.
5. Cost of drum removal is assumed to be a part of line item 1.a. The labor requirement for removing 40 drums would be in the range of approximately 1 hour for pallets and up to 4 hours for removal of individual drums with a forklift.

6. No basis is given for cleanup of spills and leaks. The cost of containment area inspection and cleanup is not estimated. Depending on the size, the \$1,000 figure in Item I.b) may be sufficient to cover this.
7. Cost of transportation to final disposal site is not included.

CLOSURE PLAN  
GEORGIA-PACIFIC CORPORATION  
STE. GENEVIEVE, MISSOURI  
(MOD092351642).

A. General

This plan is being prepared in accordance with the requirements of 40 CFR 265.112 through 265.115. This plan identifies all steps that will be necessary to completely close the facility at the end of its intended operating life. A post-closure plan is not required because this is not a disposal facility and all wastes are being removed at closure.

Georgia-Pacific will maintain an on-site copy of the approved closure plan and all revisions to the plan until the certification of closure completeness has been submitted and accepted by the U. S. EPA, Region VII and/or the Missouri DNR. Georgia-Pacific will notify the U. S. EPA and/or Missouri DNR at least 180 days prior to the date we expect to begin final closure. Upon completion of closure, Georgia-Pacific will submit to the Regional Administrator a certification by both Georgia-Pacific and a registered professional engineer that the facility has been closed in accordance with the specifications in the approved plan.

B. Performance Standard

This closure plan was designed to ensure that the facility will not require further maintenance and control, eliminates any threats to human health or environment, and avoids escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or groundwater contamination. If there is any evidence of contamination, spills, or leaks, samples will be taken and analyzed to determine the extent of contamination. Accordingly, appropriate action will be taken to remove any significant contamination or residue and disposed in an approved disposal facility.

C. Partial Closure

Partial closure of this facility is not applicable and full closure will be implemented only at the end of its useful life.

D. Maximum Waste Inventory

The following lists the maximum inventory of wastes in storage at any given time during the operating life of the facility:

drum storage facility = 40 drums (55 gal.)  
= 2,200 gallons

E. Closure of Drum Storage Facility

All of the drums in the drum storage area will be removed for disposal in an off-site approved hazardous waste disposal facility. The drums will be moved utilizing a forklift. If there is any evidence of spills, leaks, or contaminated material remaining in the storage area, the storage area will be decontaminated with a series of solvent washes. All wastewater and residues generated from cleanup will be collected and sent to a hazardous waste disposal facility.

F. Closure Schedule

Within 90 days after receipt of the final volume of hazardous wastes, final closure will be initiated. Completion of the closure will be within 180 days of this occurrence. The U. S. EPA and/or Missouri DNR will be notified by Georgia-Pacific 180 days before final closure initiation. Final closure will be certified by a registered professional engineer.

G. Post-Closure Plan

Post-closure plans and care is not applicable to this facility since it is not a disposal facility.

H. Notice in Deed

A Notice in the deed in the event of the sale of the property by Georgia-Pacific is not applicable, since it is not a disposal facility.

I. Closure Cost Estimate

An estimated \$3,000 (September, 1982) will be needed to close these facilities, as described herein. Activity estimates include removal of waste inventory, decontamination, and closure certification. The following is a cost breakdown:

- |    |   |              |
|----|---|--------------|
| a) | Removal and disposal of waste inventory |              |
|    | 40 drums @ \$50/drum                    | = \$ 2,000   |
| b) | Decontamination                         |              |
|    | Sampling and analysis                   | = (in-house) |
|    | Removal of piping                       | = (in-house) |
|    | Cleanup of spills, leaks, etc.          | = 1,000      |
| c) | Certification and Professional Services | = (in-house) |
|    | Total Closure Cost Estimate             | = 3,000      |



**J. Closure Financial Requirements**

Georgia-Pacific Corporation has demonstrated to EPA and applicable State agencies that the financial test in accordance with CFR 264 and 265 will be met for liability coverage and closure care on all Georgia-Pacific facilities.